

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**  
Plaintiff

v.

**HITLER CINTRÓN-ORTIZ,**  
Defendant.

**CRIMINAL NO. 21-316 (DRD)**

**UNOPPOSED MOTION TO CONTINUE DATE OF JURY TRIAL**

TO THE HONORABLE COURT:

1. Earlier this month, this Court set the jury trial in this case for August 22-26, 2022. (ECF No. 16). For the reasons stated further below, the government requests that the trial be continued for a later date. Undersigned counsel discussed this request with defense counsel, AFPD Ivan Santos Castaldo, who informed that the defense does not object to the request.

2. Beginning in 2019 and ending in March 2021, defendant Cintrón-Ortiz was tried in a Puerto Rico court for the October 3, 2018, armed murder of an individual named Christian Vélez-Nelson. On March 19, 2021, the state judge who presided over the bench trial acquitted the Defendant of those charges. Defendant, however, remained under federal custody because he was still subject to revocation of his supervised release in Cr. 04-195, Cr. 04-196, and Cr. 04-197 based on the incidents of October 3, 2018.

3. In the present case, Defendant has been indicted for unlawful possession of ammunition on October 3, 2018. (ECF No. 1). Much of the evidence presented by local authorities in the state trial would be presented at trial in the present federal case, in addition to other evidence that was not presented in state proceedings. The state prosecutor who handled the state case has informed the undersigned that the trial lasted approximately close to two weeks.

4. In light of the foregoing, the government believes that the jury trial in the present case may last approximately two weeks, give or take a few days.

5. Undersigned counsel has a scheduling conflict with the current trial date of August 22, 2022, because he has a jury trial in Cr. 17-636 (DRD) and Cr. 16-613 (DRD) scheduled to begin on September 5, 2022. The jury trial in Cr. 17-636 (DRD) and Cr. 16-613 (DRD) involves two armed robberies, weapons violations, numerous witnesses, and multiple crime scenes, requiring extensive trial preparation and coordination with witnesses, some of which are out of Puerto Rico and whose appearance at trial will thus require additional coordination.

6. Undersigned counsel spoke to AFPD Santos-Castaldo about either advancing or continuing the trial date in the present case. AFPD Santos-Castaldo indicated that continuing the trial date was preferable in light of the need to prepare for trial. We note that Defendant has not yet been brought back to Puerto Rico and is still at FDC Miami.

7. As per discussion with AFPD Santos-Castaldo, both parties would be available to begin the trial on October 17, 2022. Therefore, the government requests that the trial date be rescheduled to begin on October 17, 2022, and that this Court allocate approximately two weeks and a few days for the trial. Defense counsel AFPD Santos-Castaldo informed the undersigned that the defense does not object to this request.

**WHEREFORE**, the United States respectfully requests that this Court reschedule the jury trial to begin on October 17, 2022, and allocate approximately two weeks and a few days for the trial.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 27th day of May, 2022.

W. STEPHEN MULDROW  
United States Attorney

/s/ Juan Carlos Reyes-Ramos  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 27, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Juan Carlos Reyes-Ramos  
Assistant United States Attorney